

Matthew D. Francis
Nevada Bar No. 6978
Arthur A. Zorio
Nevada Bar No. 6547
BROWNSTEIN HYATT FARBER SCHRECK, LLP
5520 Kietzke Lane, Suite 110
Reno, Nevada 89511
Telephone: 775-324-4100
Fax: 775-333-8171
Email: mfrancis@bhfs.com
Email: azorio@bhfs.com

Eric G. Maurer (GA Bar # 478199)
(Admitted *pro hac vice*)
PERILLA KNOW & HILDEBRANDT LLP
5871 Glenridge Drive, Suite 350
Atlanta, Georgia 30328
Telephone: 770-927-7802
Fax: 877-389-6779
Email: e.maurer@pkhip.com

John F. Renzulli (NY Bar # 1931476)
(Admitted *pro hac vice*)
Peter V. Malfa (NY Bar # 5224720)
(Admitted *pro hac vice*)
RENUZZI LAW FIRM, LLP
One North Broadway, Suite 1005
White Plains, New York 10601
Telephone: 914-285-0700
Fax: 914-285-1213
Email: jrenzulli@renzullilaw.com
Email: pmalfa@renzullilaw.com

Attorneys for Plaintiff GLOCK, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GLOCK, INC., a Georgia corporation,

Plaintiff,

v.

POLYMER80, INC., a Nevada corporation,

Defendant.

Case No.: 3:23-cv-00086-MMD-CLB

**PLAINTIFF'S RESPONSE TO
DEFENDANT POLYMER80, INC.'S
MOTION TO WITHDRAW AS
COUNSEL**

1 Plaintiff GLOCK, INC. (“Glock”) files this Response in *partial* opposition to Defendant
2 POLYMER80, INC.’s (“Polymer80”) Motion to Withdraw as Counsel [ECF No. 48] (the “Motion
3 to Withdraw”) for the reasons set forth below.

4 Glock does not oppose the ultimate relief sought in the Motion to Withdraw to the extent
5 that counsel’s withdrawal will not cause undue delay or adjournment of any deadlines set forth in
6 the Discovery Plan and Scheduling Order [ECF No. 37], and the Markman/Claim Construction
7 Hearing can proceed as scheduled by Chief Judge Du on February 22, 2024 at 10:00AM [ECF No.
8 45]. Accordingly, should the Court be inclined to grant the Motion to Withdraw, Glock respectfully
9 requests that the Court issue an Order directing Polymer80 to secure replacement counsel by no
10 later than January 12, 2024.

11 Dated: This 19th day of December, 2023.

12 **BROWNSTEIN HYATT FARBER SCHRECK, LLP**

13
14 By: /s/ Matthew D. Francis

15 Matthew D. Francis

16 Arthur A. Zorio

5520 Kietzke Lane, Suite 110

Reno, Nevada 89511

Telephone: 775-324-4100

Fax: 775-333-8171

Email: mfrancis@bhfs.com

Email: azorio@bhfs.com

19 Eric G. Maurer

(Admitted *pro hac vice*)

20 PERILLA KNOW & HILDEBRANDT LLP

5871 Glenridge Drive, Suite 350

Atlanta, Georgia 30328

Telephone: 770-927-7802

Fax: 877-389-6779

Email: e.maurer@pkhip.com

25 John F. Renzulli

(Admitted *pro hac vice*)

26 Peter V. Malfa

(Admitted *pro hac vice*)

27 RENZULLI LAW FIRM, LLP

One North Broadway, Suite 1005

BROWNSTEIN HYATT FARBER SCHRECK, LLP

5520 Kietzke Lane, Suite 110

Reno, NV 89511

Tel. 775-324-4100

White Plains, New York 10601
Telephone: 914-285-0700
Fax: 914-285-1213
Email: jrenzulli@renzullilaw.com
Email: pmalfa@renzullilaw.com

Attorneys for Plaintiff GLOCK, Inc.

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 19th day of December, 2023, I served the document entitled, **PLAINTIFF'S RESPONSE TO DEFENDANT POLYMER80, INC.'S MOTION TO WITHDRAW AS COUNSEL**, on counsel of record through the CM/ECF system.

/s/ Jeff Tillison

Employee of Brownstein Hyatt Farber
Schreck, LLP